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[Additional Counsel and Parties Appear at End]

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

LAWRENCE MARKEY,

Plaintiff,

vs.

ALLIANCE SEMICONDUCTOR
CORPORATION, et al.,

Defendants.

Civil No. C-06-7428 MMC

MDL 1819

**JOINT STIPULATION TO STAY
PROCEEDING OR, IN THE ALTERNATIVE,
CONTINUE CASE MANAGEMENT
DEADLINES PENDING TAG-ALONG
ORDER PURSUANT TO JUDICIAL PANEL
ON MULTIDISTRICT LITIGATION ORDER
GRANTING MDL 1819; ~~PROPOSED~~
ORDER**

Pursuant to Civil Local Rules 7-12 and 16-2(e) of the United States District Court for the Northern District of California, the following parties hereby stipulate to a stay of the proceeding, or, alternatively, a continuance of the case management dates, for the following good cause:

1. At least 65 complaints have been filed to date in federal district courts by plaintiffs bringing class actions on behalf of either direct or indirect purchasers alleging price fixing by manufacturers of Static Random Access Memory ("SRAM") (collectively, the "SRAM cases").

2. On February 9, 2007, the Judicial Panel on Multidistrict Litigation ("JPML") issued a transfer order centralizing certain SRAM cases and the SRAM litigation in this district for coordinated or consolidated pretrial proceedings pursuant to 28 U.S.C. §1407 (MDL No. 1819).

3. The JPML's February 9, 2007 order states that the JPML has been notified of over 50 additional related actions, and that these actions and any other related actions will be treated as potential tag-along actions pursuant to Rules 7.4 and 7.5 of the Rules of Procedure of the JPML.

4. The parties agree that the above-captioned case will be consolidated shortly into MDL No. 1819 pursuant to Rules 7.4 and 7.5 of the Rules of Procedure of the JPML.

5. Even before the February 9, 2007 transfer order issued by the JPML, at least four courts in this district determined that there existed grounds to either stay an SRAM proceeding or continue case management deadlines in six SRAM actions pending the outcome of proposed MDL No. 1819. *See Dataplex, Inc. v. Alliance Semiconductor Corp., et al.*, No. 06-6491 CW (12/27/06 Order of Judge Wilken to temporarily stay proceeding pending decision by JPML); *Stargate Films, Inc. v. Alliance Semiconductor Corp., et al.*, No. 06-7007 CW (12/27/06 Order of Judge Wilken to temporarily stay proceeding pending decision by JPML); *Maites v. Samsung Electronics Co., Ltd., et al.*, No. 6-6542 SBA (12/27/06 Order of Judge Armstrong to continue case management dates pending decision by JPML); *Reclaim Center, Inc., et al. v. Samsung Electronics Co., Ltd., et al.*, No. 06-6533 SI (12/22/06 Order of Judge Illston to stay proceeding pending decision by JPML); *Madsen v. Samsung Electronics Co., Ltd., et al.*, No. 06-6541 SI (12/22/06 Order of Judge Illston to continue case management deadlines pending decision by JPML); *Ma v. Alliance Semiconductor Corp., et al.*,

No. 06-6511 EDL (12/20/06 Order of Judge Laporte to continue case management deadlines and conference pending decision by JPML).

6. Several of the dates set forth in the Case Management Scheduling Order filed December 5, 2006 in the above-captioned case (Document 2), including deadlines imposed by Federal Rules of Civil Procedure 26, Local Rule 16, and ADR Local Rule 3.5, will likely come to pass before the above-captioned case is consolidated into MDL No. 1819 pursuant to Rules 7.4 and 7.5 of the Rules of Procedure of the JPML.

7. The parties agree that a temporary stay of this proceeding pending the consolidation of the above-captioned case into MDL 1819 would promote judicial efficiency, allow consistency in pretrial rulings, and be most convenient to the parties, including the Plaintiffs in the above-captioned action.

8. The parties agree that this joint stipulation does not constitute a waiver of any defense, including but not limited to the defense of lack of personal or subject matter jurisdiction or improper venue.

9. Accordingly, the parties hereby STIPULATE to and respectfully request the Court to temporarily STAY the proceeding and VACATE the dates set forth in the Case Management Scheduling Order filed December 5, 2006 (Document 2) pending the consolidation of the above-captioned case into MDL 1819. The affected dates include the deadline to meet and confer and file Joint ADR Certification (currently February 16, 2007); the deadline to complete Initial Disclosures, the Joint Case Management Statement, and the Rule 26(f) Report (currently March 2, 2007); and the Initial Case Management Conference (currently March 9, 2007).

10. In the alternative, the parties hereby STIPULATE to and respectfully request the Court to CONTINUE the dates set forth in the Case Management Scheduling Order filed December 5, 2006

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(Document 2). The affected dates are those set forth in Paragraph 9. The parties propose extending these dates 90 days to May 17, June 1, and June 8, 2007, respectively.

Dated: February 16, 2007

Respectfully Submitted,

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By: /s/ Adam Wilson
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Dated: February 16, 2007

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By: /s/ Elizabeth C. Pritzker
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1
2 DATED: February 16, 2007

Respectfully submitted:

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5 Robert Pringle

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11 DATED: February 16, 2007

Respectfully submitted:

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PURSUANT TO STIPULATION, IT IS SO ORDERED. The above-titled case is stayed pending a decision by the Judicial Panel on Multidistrict Litigation.

Dated: February 21, 2007



THE HONORABLE MAXINE M. CHESNEY
United States District Judge